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VIA ECF

Honorable Andrew B. Altenburg, Jr., U.S.B.J.
Mitchell H. Cohen U.S. Courthouse
400 Cooper Street, 4th Floor
Courtroom 4B
Camden, New Jersey 08101

**Re: Rosa Maria Styles
Chapter 11 Case No. 19-32881 (ABA)**

Dear Judge Altenburg:

As you know this firm is counsel to the chapter 11 debtor and debtor-in-possession, Rosa Maria Styles (the "Debtor"). Pending before Your Honor is the (i) Motion of Thomas J. Welsh, Jr. Motion to Enforce the Terms of the Confirmed Chapter 11 Plan Pursuant to 11 U.S.C. §§ 105(a) and 1142 (the "Welsh Motion") which is returnable August 10, 2021; and (ii) the Debtor's Motion to (A) Authorize Sale of Debtor's Real Property Free and Clear of Liens, Claims and Encumbrances Pursuant to 11 U.S.C. § 363 (b), (f), and (m); and (B) Granting Related Relief (the "Sale Motion") which is returnable August 31, 2021.

We write in request to adjourn the Welsh Motion to be adjourned and returnable on the same date as the Sale Motion – August 31, 2021. The Debtor would have filed the Sale Motion on shortened time, however, pursuant to D.N.J. L.B.R. 6004(c), a motion to sell property must be accompanied by the Notice of Proposed Private Sale which requires a hearing to be at least twenty-eight (28) days from the date of the notice. Shortened time was not requested to allow time for the "highest and best" offer. Should the Sale Motion be approved, the Welsh Motion is moot. Thus, it is in the best interest of all parties for both motions to be heard on the same day. In addition, even if the Debtor requested a short adjournment of the Welsh Motion, I am away on vacation from August 14 through August 28th.

As always, we thank the Court for its courtesies. Thank you.

Respectfully,

/s/ Anthony Sodono, III

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